

ORIGINAL

Omar E. Santa-Perez

Vs

717 S. East Shattlesworth Circle
Cincinnati, OH 45229

NBCUniversal, Inc.
30 Rockefeller Plaza
New York, New York 10112

&

A 1706927

TD Ameritrade Holding Corporation
200 South 108th Avenue
Omaha, Nebraska 68154

Plaintiff "Omar E. Santa-Perez" is filing complaint on both Defendants "NBCUniversal, Inc" and "TD Ameritrade Holding Corporation" for punitive damages in amount to \$5,100,000.00.

Plaintiff complaint on Defendant "NBCUniversal, Inc" is based on its slanderous defamation of character and moral rights through unwarranted intrusion into Plaintiff's personal electronics for media advancement through exploitation. "NBCUniversal, Inc." through its television network has burden Plaintiff "Omar Santa" with continuous infliction of emotional distress through its harassing eavesdropping on personal electronics. "NBCUniversal, Inc." has on multiple occasions distorted facts to advance its media outlet on slanderous facts relating to Plaintiff's persona and extended family.

Plaintiff complaint on Defendant "TD Ameritrade Holding Corporation" is based on failure to protect consumer-client Personal Identifiable Information (PII) from unauthorized and unsecured entities. For colluding and conspiring with Defendant "NBCUniversal, Inc." to perform eavesdropping activities, through Plaintiff used Interactive Trading Platform (ITP), on Defendant's subsidiary TD Ameritrade, Inc ThinkorSwim & Trade Architect ITP. Plaintiff is also holding "TD Ameritrade Holding Corporation" liable for negligently risking Plaintiff internet network security, colluding with Defendant "NBCUniversal, Inc" to divulge PII relating to Plaintiff's Taxpayer Identification Number (TIN), online identity, contextual identity, and raising critical privacy concerns.



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COMMON PLEAS

Defendant “MSNBC” a subsidiary of “NBCUniversal, Inc” further to be interchangeable as either Defendant “NBCUniversal, Inc”, as a whole, or Defendant “MSNBC” as main culprit; for explanation purposes “MSNBC”, began breaking a story on Plaintiff “Omar Santa”.

“MSNBC” is a television network that provides news and political commentary relating to financial markets around the globe. “MSNBC” operates in The United States, Canada, Caribbean, Latin America, Europe, Africa, The Middle East, and Asia. “MSNBC” along with its sister channels all part of “NBCUniversal, Inc” with parental guidance of Comcast Corporation a global communication and satellite provider of all things communications.

On the months March of 2017 and may of 2017 Defendant “MSNBC” increasingly started to reveal Plaintiff’s (1) public persona: legal name, state of residence, employment history, (2) personal details: city and residence, current employment, physical descriptions including gender, ethnicity, and status, (3) private & privileged information: digital identities and online content (4) intellectual stored data property: files, folders, names, and content.

Defendant “NBCUniversal, Inc” divulged a private citizen, globally, with no active involvement in corporate activities relating to financial markets or providing any contribution via product or service to businesses. The probe executed by “NBCUniversal, Inc” was unrelated to its core media outlet and neglected potential consequences to Plaintiff. “NBCUniversal, Inc” tested the limit of false light with zero contribution to public safety or concern, at the expense of Plaintiff’s “Omar Santa” Right of Peace, reputation, future opportunities, safety, and emotional consideration.

In a matter of (4) four weeks “MSNBC” created a character, grandeur a persona, unmasked, and assassinated the character through its slanderous commentaries. “MSNBC” started its commentary probe through publically accessed databases for background information on Plaintiff. As the character was identified so did the amount of personally identifiable information (PII) that was released to a global audience. With ever increasing newsgathering of PII “MSNBC” negligently penetrated, “browser security,” of Plaintiff’s home computer. “NBCUniversal, Inc” with direct access to Plaintiff’s Internet Service Provider (ISP) gained additional access to Plaintiff’s home electronics. The act of going directly into Plaintiff’s personal computers was absolute trespass. Along with the trespass of Plaintiff’s home electronics, intrusive consequences were inflicted on plaintiff such the violations of Plaintiff’s Right to Internet Access.

Defendant “NBCUniversal, Inc” extended its resources to collude with Defendant “TD Ameritrade Holding Corporation” in an exercise to surveil Plaintiff’s action on the internet and advance its project of invading Plaintiff’s Natural Rights to peace, as to Right of Privacy in misappropriation to commercial use for own self advancement at cost to Plaintiff.

“NBCUniversal, Inc” unveiled a connection between “TD Ameritrade, Inc” as a provider of service to Plaintiff. Together with “TD Ameritrade Holding Corporation” “CNBUniversal, Inc” was able to directly connect into Plaintiff’s personal computer (PC).

“TD Ameritrade, Inc” is a subsidiary of “TD Ameritrade Holding Corporation”

Defendant "TD Ameritrade, Inc" to be an interchangeable name with "TD Ameritrade Holding Corporation," the holding company of, "TD Ameritrade, Inc" for explanation purposes. Defendant "TD Ameritrade, Inc" is an online investing service provider to individuals & institutional customer for investing vehicles. "TD Ameritrade" owns and operates Interactive Trading Platforms (ITP) such as the ThinkorSwim Platform & the Trade Architect Platform.

Defendant "NBCUniversal, Inc." used the Trade Architect Platform installed on Plaintiff's home electronics as a direct link to surveillance and browse Plaintiff's personal computer and cellular device.

Defendant "TD Ameritrade Holding Corporation" failed to secure Plaintiff's Personal Identifiable Information (PII). "TD Ameritrade, Inc" failed to secure sensitive information and allowed "MSNBC" to frivolously release PII. "TD Ameritrade Holding Corporation" has breached confidence to protect customer-client information relating to financial security. "TD Ameritrade, Inc." has also senselessly allowed the penetration a consumer's identity to be toyed and internal system manipulated to breach customer's network security.

It was through "TD Ameritrade, Inc." internal system that "NBCUniversal, Inc." gained extensive access to unconventional information relating to Plaintiff "Omar Santa" background and obscure data information. The Trade Architect allows personal interaction between the user and the service provider to perform actions such as manage monetary account holdings, banking account & investment account numbers, and financial statements.

The actions performed by "MSNBC" trespassed on Plaintiff's dwelling, intruded on Plaintiff's personal, "hard drive," invaded the privacy of a citizen, violated the Plaintiff's natural right, personal right, right to internet access, psychologically harassed Plaintiff as daily routine, and provided a toxic environment for Plaintiff to perform daily and financial activities by constant surveillance on electronics. Defendant "NBCUniversal, Inc." also ignored the personal safety of the Plaintiff to perform personal activities and enticed rogue agents to perform similar actions by "NBCUniversal, Inc" to seek and breach Plaintiff's network security.

The material obtained by "NBCUniversal, Inc." prompted "MSNBC" to create a character, assassinated the character, exploited all relevant materials for its personal benefit all while jeopardizing the Plaintiff's safety in the process without any regards to natural or moral laws.

Plaintiff "Omar E. Santa-Perez" is seeking \$3,315,000 from Defendant "NBCUniversal, Inc" for slanderous defamation through character assassination and distortion of material. Accompanying the defaming actions by "NBCUniversal, Inc" are Trespassing on dwelling, Intruding on Privacy and business, Unwarranted Eavesdropping & Surveillance, Disruption on Right to Peace, Psychological Harassment, Invasion of Privacy under Privacy Laws, Misappropriation of

sensitive PII, Digital Identity, Personal Identity, Network Security, and Right of Publicity for media advancement, and Jeopardizing all aspects of Safety and Privacy by rogue agents.

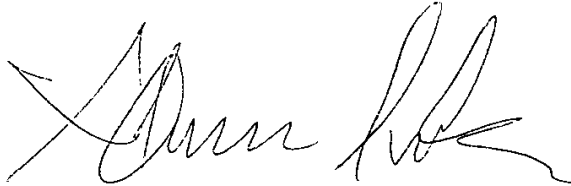
Plaintiff "Omar E. Santa-Perez" is seeking \$1,785,000 from Defendant "TD Ameritrade Holding Corporation" for Breach of Confidence, Network Security, Personal Identifiable Information Security, Collusion to eavesdrop, Privacy, Negligence to Secure Data Leak.

Plaintiff is claiming a resolution of \$5,100,000.00 to waive actions by both Defendants in appropriation to 65% Defendant "NBCUniversal, Inc" and 35% Defendant "TD Ameritrade Holding Corporation".

Plaintiff is also seeking peace of mind from future eavesdropping, surveillance, and retaliation. In addition Plaintiff seeks no further publication of character Plaintiff or future character involving Plaintiff without expressed and written consent.

Plaintiff is seeking an extended life guarantee of consumer identity protection with and insurance policy for any future and unforeseen events.

Plaintiff is seeking any unwarranted collection of withheld material to be deleted and never be published without expressed and written consent.

A handwritten signature in black ink, appearing to read "Omar Santa-Perez", with a large, stylized initial "O" and a long, sweeping underline.